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**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In re:

NOEMI VALDEZ PINEDO and
MARGARITO ALONSO PINEDO,

Debtors

Case No. 09-54650-ASW

Chapter 11

ATTORNEY'S SUPPLEMENTAL
DECLARATION IN SUPPORT OF DEBTORS'
OBJECTION TO MOTION CONFIRMING NO
LIEN STRIPPING OF MOVANT'S FIRST
PRIORITY LIEN IS PERMITTED IN
ACCORDANCE WITH 11 U.S.C. § 1123
(B)(5) OR IN THE ALTERNATIVE, TO
EXTEND THE TIME FOR THE MOVANT TO
MAKE AN ELECTION IN ACCORDANCE
WITH 11 U.S.C. § 1111(B) UNTIL SUCH
TIME AS AN ORDER VALUING THE
COLLATERAL IS ENTERED; REQUEST
FOR JUDICIAL NOTICE IN SUPPORT

I, SARA J. LIPOWITZ, attorney for the Debtors NOEMI VALDEZ PINEDO and MARGARITO
ALONSO PINEDO, declare under penalty of perjury, as provided for by the laws of the United States,
28 U.S.C. § 1746, that the following statements are true:

- 1 1. At all times relevant to the above-captioned case, Debtors have resided at 418 California St.,
2 Unit C, Salinas, CA 93901. A true and fair copy of the Voluntary Petition, filed on 6/13/09, is
3 attached hereto as Exhibit A.
- 4 2. Prior pleadings filed with this Court may have given the impression that the Debtors reside at
5 406 California St., Salinas, CA 93901. Though Debtors did reside there at one time, they have
6 not done so since prior to the filing of this case.
- 7 3. The Debtors do not believe that this information changes the Debtors' arguments in this Motion,
8 but wish to disclose this information in the interests of clarity.
9

10 I swear under penalty of perjury under the laws of the United States that the foregoing is true and
11 correct.
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13 Executed at Santa Cruz, California on August 19, 2010.
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18 /s/ Sara J. Lipowitz
19 Attorney for the Debtors
20 Noemi Valdez Pinedo and
21 Margarito Alonso Pinedo
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